

REMARKS

Claims 25-30 and 41-54 are presented for consideration, with Claims 25, 30, 44, 49, 53 and 54 being independent.

The independent claims have been amended to further distinguish Applicant's invention from the cited art.

Claims 25, 28, 29, 30, 41, 42, 44, 47, 48, 49, 50, 51, 53 and 54 stand rejected under 35 U.S.C. §103 as allegedly being obvious over Gotoh '196 in view of Gondek '990. The remaining dependent claims stand rejected as allegedly being obvious over those citations and further in view of Aschman '578 (Claims 26 and 45), or Sanger '601 and Kakutani '212 (Claims 27, 43, 46 and 52). These rejections are respectfully traversed.

Claim 25 of Applicant's invention relates to an image processing apparatus comprised of a first unit for converting primary color data into a color data for outputting a dark color material only in a first mode, wherein the primary color has any two of maximum values and one of minimum values of colors R, G and B, and a second unit for converting the primary color data having any two of maximum values and one of minimum values of colors R, G and B into color data for outputting both the dark color material and a light color material in a second mode. As claimed, the color data converted from the primary color data in the second mode is color data for outputting both the dark color material corresponding to a complementary color of the minimum value of colors and light ink material other than the complementary color of the minimum value of colors.

As will be appreciated, Claim 25 has been amended to further emphasize that the primary color data converted in the second mode has any two of maximum values and one of

minimum values of colors R, G and B. In accordance with Applicant's invention, a high performance image processing apparatus can be provided.

The Gotoh patent relates to a recording method that uses light and dark color inks. With reference to Figure 1, a distribution table A distributes printing data for dark ink and light ink, a distribution table B distributes print data for dark colors only, and a distribution table C distributes printing data for light colors only. The Office Action relies on Gotoh for a teaching of a first unit for converting primary color data into color data for outputting a dark color material in the first mode, and a second unit for converting the primary color data into color data for outputting both the dark color material and the light color material in the second mode.

The Office Action acknowledges that Gotoh does not disclose a first mode wherein the primary color has any two of maximum values and one of minimum values of colors R, G and B, and a second mode wherein the color data converted from the primary color data in the second mode is color data for outputting both the dark color material corresponding to a complementary color of the minimum value of colors and light ink material other than complementary color of the minimum value of colors. The secondary citation to Gondek was cited to compensate for the deficiencies in Gotoh.

In Gondek, an ink jet printing system and method is disclosed and capable of converting R, G, B images using a conversion table. The Office Action asserts that Gondek includes a first mode wherein the primary color has any two of maximum values and one of minimum values of colors R, G and B, and a second mode wherein the color data converted from the primary color data in the second mode is color data for outputting both the dark color material corresponding to a complementary color of the minimum value of colors and light ink

material other than the complementary color of the minimum value of colors. With respect to the second mode, however, it is respectfully submitted that the primary color in Gondek is $(R, G, B) = (8, 8, 0) (8, 0, 8) (0, 8, 8)$, and not $(6, 0, 6)$ as asserted in the Office Action. Moreover, relying on the table shown in columns 7 and 8 of Gondek, it is respectfully submitted that converted color data corresponds to a dark color material but not to a light ink material. Gondek fails, therefore, to teach or suggest a color data converted from the primary color data in the second mode that is color data for outputting both the dark color material corresponding to a complementary color of the minimum value of colors and light ink material other than the complementary color of the minimum value of colors.

It is submitted, therefore, that the proposed combination of Gondek and Gotoh, even if proper, still fails to teach or suggest Applicant's invention as set forth in Claim 25. Independent Claims 44 and 53 relate to an image processing method and a computer readable medium, respectively, and correspond to Claim 25. These claims are thus also submitted to be patentable over the proposed combination of Gotoh and Gondek.

With respect to Claim 30, an image processing apparatus for forming an image by using the dark color materials and light color materials includes a first unit for forming an image by using just the dark color material for reproducing primary color data in a first mode, wherein the primary color has any two of maximum values and one of minimum value of colors R, G and B, and a second unit for forming an image by using the dark color material and a light color material having a different color from the dark color material for reproducing the primary color data having any two of maximum values and one of minimum value of colors R, G and B in a second mode. The image formed in a second mode is formed by using both the dark color

material corresponding to a complementary color of the minimum value of colors and light ink material other than the complementary color of the minimum value of colors.

Similar to Claim 25, in Claim 30 the image is formed in the second mode by using both the dark color material corresponding to a complementary color of the minimum value of colors and light ink material other than the complementary color of the minimum value of colors. Claim 30 is thus also submitted to be patentable over the proposed combination of Gotoh and Gondek. Independent Claims 49 and 54 relate to an image processing method and a computer readable recording method, respectively, and correspond to Claim 30. These claims are thus also submitted to be patentable for the reasons discussed above.

Accordingly, reconsideration and withdrawal of the rejection of Claims 25, 28, 29, 30, 41, 42, 44, 47, 48, 49, 50, 51, 53 and 54 under 35 U.S.C. §103 is respectfully requested.

The tertiary citation to Aschman relates to an image processing apparatus and is relied on for its teaching of a fast printing mode. The tertiary citation to Sanger relates to a printing apparatus and is relied on for its teaching of a color matching mode. Finally, the tertiary citation to Kakutani relates to a printing system and is used for its teaching of a mode for lowering granularity. These tertiary citations fails, however, to compensate for the deficiencies in Gotoh and Gondek as discussed above.

Accordingly, without conceding the propriety of combining the art in the manner proposed in the Office Action, reconsideration and withdrawal of the remaining rejections under 35 U.S.C. §103 are respectfully requested.

Thus, it is submitted that Applicant's invention as set forth in independent Claims 25, 30, 44, 49, 53 and 54 is patentable over the cited art. In addition, dependent Claims 26-29, 41-43, 45-48 and 50-52 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Scott D. Malpede/

Scott D. Malpede
Attorney for Applicant
Registration No. 32,533

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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